Remarks

Reconsideration and allowance of the above referenced application are respectfully requested.

Claims 7-14 stand rejected under 35 USC 112, first paragraph, as allegedly failing to comply with the written description requirement. This contention is respectfully traversed.

The rejection states that there is no "common control disclosed in the specification. However, this is respectfully traversed, since the original specification page 21 lines 20-21 clearly states that "all lamps in a group, i.e., those that need to be controlled together...".

Page 22 lines 5-6 describe that the lights "can be controlled as though they were all mounted, oriented and facing in the same direction".

Page 22 lines 19-21 describe that "the same lighting effect can be obtained by installing on any truss facing in any desired direction".

Clearly, therefore, this supports controlling the lamps as a group using a common control. However, to the extent that the objection was based on the fact that the words "common control" is not present, each of claims 7 and 10 has been amended. As amended, for example, claim 7 defines controlling the group of lamps to move as though each lamp was mounted oriented as facing in the same

direction even though they are not all facing in the same direction. Claim 10 has been analogously amended. Nothing in the prior art is in any way suggestive of this feature as will be described herein.

Removing the recitation of the "common control" also obviates the rejection to claims 7-14 under 35 USC 112, second paragraph.

The objection to the drawings has been amended by amending the specification to correct the typographical error listing Figures 13A and B, when in fact there is only a figure 13.

Claims 7-14 stand rejected under 35 USC 103 as allegedly being unpatentable based on US patent number 5,432,691 to Garrett. This contention is respectfully traversed.

Garrett clearly shows a number of different lights connected to a truss. Note the position of the lights 100 for example in figure 3. Each of these lights is in precisely the same position. Note also a similar configuration in figure 8 where all the lights are located in the same direction. Garrett's Figure 9 again shows two lights, which are apparently in the same direction. Garrett's Figure 10 shows two lights in different directions, but it is quite clear that since these lights are shining in precisely opposite directions, it makes no sense that they would be controlled to move commonly as though each of the plurality of lamps was mounted oriented as

facing in the same direction.

Garrett's Figure 14 shows one light below another light. Again, there is no disclosure that these lights are controlled to move together, and in fact, Garrett teaches away from this.

Garrett's description of figure 14 is about the so-called secondary deployment mechanism of figure 12. That secondary deployment mechanism is intended to allow the two lights to pan and tilt independently. Column 7 lines 32-54 describes that the secondary deployment mechanism is used for preventing lights which would otherwise interfere with each other's ability to freely pan and tilt as clearly stated in that section. This is not, as claimed, a system that allows all of the lights to move commonly, in fact it is quite the opposite—intending for each light to move independently. By Garrett's own teaching, this system would not be needed if all the lights moved commonly – it is only needed to allow the lights to move independently. Therefore, quite clearly Garrett does not make obvious the subject matter of the current claims.

More specifically, claim 7 defines mounting a plurality of truss mounted lamps in a way such that each of the lamps is controlled to move and alter the direction in which a group of lamps is pointing; where all the lamps are pointing in a common direction; attaching each of the lamps to trusses, using a scale to adjust

the base position of the lamps and controlling the group of lamps to move as though each lamp was mounted oriented in the same direction. Note that this allows controlling the lamps to move commonly as though each lamp was mounted in the same direction, even though each lamp is not mounted in the same direction. In fact, it the lamps are on different trusses which extend in different directions.

Nothing in Garrett discloses or suggests trusses extending in different directions. Nothing in Garrett suggests the claimed scale. Nothing in Garrett controls lamps to move so that all the lamps are pointing in a common direction. In fact, Garrett specifically states that the reason for doing this is so that the lamps have a full range of pan and tilt capability independent of each other lamp.

Therefore, claim 7 should be allowable along with the claims that depend therefrom.

Claim 10 defines attaching a plurality of lamps to a plurality of different trusses where at least one of the trusses extends in a different direction than the other of the trusses and adjusting an angle between the truss and the connection to the lamps. There is absolutely nothing in Garrett that suggests this subject matter. Garrett clearly does have a spring-loaded part, but there is absolutely nothing in Garrett that allows loosening, adjusting an angle and tightening.

Moreover, claim 10 defines controlling different lamps to move commonly as though each of the plurality of lamps was mounted oriented as facing in the same direction. As discussed above, Garrett teaches away from this feature, and therefore this subject matter is completely unobvious by Garrett.

The dependent claims should also be allowable. Claim 14 defines prevention of overtwisting, which is not disclosed or suggested by the cited prior art.

For all of these reasons, all of the claims should be allowable.

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

For all of these reasons, it is respectfully suggested that all of the claims

should be in condition for allowance. A formal notice of allowance is hence respectfully requested.

If the Examiner believes that communications such as a telephone interview or email would facilitate disposal of this case, the undersigned respectfully encourages the Examiner to contact the undersigned.

Recognizing that Internet communications are not secure, I hereby authorize the USPTO to communicate with me concerning any subject matter of this application by electronic mail (using the email address harris@schiplaw.com). I understand that a copy of these communications will be made of record in the application file.

Please charge any fees due in connection with this response, (excluding any fees paid via EFS), to Deposit Account No. 50-4376.

Respectfully submitted,

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